

# Exhibit 2

**Watson, Travis W. (Phila)**

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**From:** Powell, Courtney <cpowell@spencerfane.com>  
**Sent:** Wednesday, February 1, 2023 5:37 PM  
**To:** Tianna Mays  
**Cc:** Arthur Ago; Swaminathan, Lisa B. (Phila); Jonathan Irwin; Woody Glass; Hatza, Nikki (Phila); Ben Aiken; Watson, Travis W. (Phila); Babchinetskaya, Izabella (Phila); Lester, Andy; Ferate, AJ; Holkum, Laura; Leckerman, Jason (Phila)  
**Subject:** RE: Hill v. Town of Valley Brook

**⚠ EXTERNAL**

Tianna –

With regard to the documents, we do not know that there are “missing” ticket jackets. When we spoke with Idoxs, we noted that there were fewer ticket jackets than the previous years for 2020 and 2021. We did state that would confirm that we have all documents. We also advised that the client indicated that would be the case for 2020 and 2021 due to COVID. We did state that we would speak with our receptionist (she was away from the office until today), who had been removing staples from the envelopes to determine if she had been working on any boxes containing 2021 ticket jackets. She was not working on any boxes that contained tickets for 2021.

As discussed with Idoxs, there were two banker boxes and one smaller box that contained ticket jackets for a wide range of years (many of which do not fall within the scope of this case). These boxes are being searched and sorted for any ticket jackets that fall within the respective time frame.

We will advise Idoxs of the status of the review and let you know if anything changes.

Thanks, Courtney

**Courtney Powell** Of Counsel  
Spencer Fane LLP

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**From:** Tianna Mays <tmays@lawyerscommittee.org>  
**Sent:** Tuesday, January 31, 2023 3:28 PM  
**To:** Powell, Courtney <cpowell@spencerfane.com>  
**Cc:** Arthur Ago <aago@lawyerscommittee.org>; Lisa Swaminathan <SwaminathanL@ballardspahr.com>; Jonathan Irwin <jonathan@wardglasslaw.com>; Woody Glass <woody@wardglasslaw.com>; Nikki Hatza <hatzan@ballardspahr.com>; Ben Aiken <baiken@lawyerscommittee.org>; Travis Watson <watsontw@ballardspahr.com>; Isabelle Babchinetskaya <Babchinetskaya@ballardspahr.com>; Lester, Andy <alester@spencerfane.com>; Ferate, AJ <AJFerate@spencerfane.com>; Holkum, Laura <lholkum@spencerfane.com>; Jason Leckerman <leckermanj@ballardspahr.com>  
**Subject:** [EXTERNAL] RE: Hill v. Town of Valley Brook

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Courtney,

We are in receipt of your correspondence dated November 17, 2022, in response to our January 24, 2023, letter. Based on representations in your letter, we prefer to meet and confer on the issues raised after February 3, 2023, the day you indicated we would receive additional information from Defendants. We will contact you to schedule a date and time for a meet and confer, if needed, early next week.

Second, Officer Nelson will receive notice for a deposition on February 10, 2023, shortly. Due to Plaintiffs' counsel's limited availability in February, we need to depose Officer Nelson on that date. Given the difficulties we've had scheduling Officer Nelson's depositions and his failure to appear at his January 11, 2023, deposition, we do not anticipate an objection to the 14-day notice requirement.

Last, on Wednesday, January 25, 2023, we received information from Idoxs representatives that you turned over half a box of ticket jackets—approximately 200 tickets—for year 2021 for copying. It is our understanding that you represented that you would contact your client to find out about the missing ticket jackets. As you may recall, you had 38 boxes at your office that you stated represented 2017- most of 2022. Idoxs collected 15 boxes from your office—most of those boxes were 2019. 2020 and 2021 should have had a similar number of boxes—approximately 6 boxes for each year. To date, Idoxs has not received an update on the status of the missing 2021 boxes of ticket jackets. Please provide an update on the status of the missing ticket jackets by February 3, 2023.

Sincerely,

**Tianna J. Mays**

Associate Director, Criminal Justice Project  
Lawyers' Committee for Civil Rights Under Law  
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**From:** Powell, Courtney <[cpowell@spencerfane.com](mailto:cpowell@spencerfane.com)>  
**Sent:** Monday, January 30, 2023 10:25 PM  
**To:** Jason Leckerman <[leckermanj@ballardspahr.com](mailto:leckermanj@ballardspahr.com)>  
**Cc:** Tianna Mays <[tmays@lawyerscommittee.org](mailto:tmays@lawyerscommittee.org)>; Arthur Ago <[aago@lawyerscommittee.org](mailto:aago@lawyerscommittee.org)>; Lisa Swaminathan <[SwaminathanL@ballardspahr.com](mailto:SwaminathanL@ballardspahr.com)>; Jonathan Irwin <[jonathan@wardglasslaw.com](mailto:jonathan@wardglasslaw.com)>; Woody Glass <[woody@wardglasslaw.com](mailto:woody@wardglasslaw.com)>; Nikki Hatza <[hatzan@ballardspahr.com](mailto:hatzan@ballardspahr.com)>; Ben Aiken <[baiken@lawyerscommittee.org](mailto:baiken@lawyerscommittee.org)>; Travis Watson <[watsonw@ballardspahr.com](mailto:watsonw@ballardspahr.com)>; Isabelle Babchinetskaya <[Babchinetskaya@ballardspahr.com](mailto:Babchinetskaya@ballardspahr.com)>; Lester, Andy <[alester@spencerfane.com](mailto:alester@spencerfane.com)>; Ferate, AJ <[AJFerate@spencerfane.com](mailto:AJFerate@spencerfane.com)>; Holkum, Laura <[lholkum@spencerfane.com](mailto:lholkum@spencerfane.com)>  
**Subject:** Hill v. Town of Valley Brook

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Counsel –

Please see the attached correspondence and responses to requests for admission.

Thank you,  
Courtney

**Courtney Powell** Of Counsel  
Spencer Fane LLP

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